

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

MOTION TO DISMISS

CASE NO.: 15-Cr-00706 (VSB)

FRANCIS LORENZO et al,

Defendant.

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**DEFENDANT'S MOTION TO DISMISS INDICTMENT
ON GROUNDS OF DIPLOMATIC IMMUNITY**

Defendant, **FRANCIS LORENZO** ("LORENZO"), by and through undersigned Counsel hereby files this Motion to Dismiss Indictment on Grounds of Diplomatic Immunity and Memorandum of Law. This Cause comes before the Court upon the pending Indictment against Ambassador LORENZO, who is entitled to automatic and immediate dismissal of this Indictment on grounds of Diplomatic Immunity.

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Dated: December 15, 2015

By: s/Brian H. Bieber
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